

OUTTEN & GOLDEN LLP

Cara E. Greene
Gregory S. Chiarello
Shira Z. Gelfand
685 Third Avenue, 25th Floor
New York, New York 10017
(212) 245-1000

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 1:19-cv-08655 (LGS)

**MOTION THREE:
PLAINTIFF'S NOTICE OF MOTION *IN LIMINE* TO EXCLUDE EVIDENCE
CONCERNING YOLANDA PIAZZA OR DEFENDANT'S CONSIDERATION OR
SELECTION OF CANDIDATES FOR THE VICE PRESIDENT- FINANCIAL
SERVICES, SALES ROLE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion *in Limine* to Exclude Evidence Concerning Yolanda Piazza or Defendant's Consideration or Selection of Candidates for the Vice President - Financial Services, Sales Role, Plaintiff Ulku Rowe, by and through the undersigned counsel, now moves this Court, before the Honorable Lorna G. Schofield, at the United States District Court, United States Courthouse, Courtroom 1106, 40 Centre Street, to grant Plaintiff's Motion *in Limine* pursuant to Judge Lorna G. Schofield's Individual Rules and Procedures, Rule IV(B)(3). Plaintiff respectfully requests that the Court enter an Order granting her Motion *in Limine*.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's October 14, 2022 Order, ECF No. 225, any response to this motion shall be filed by December 5, 2022, and no reply shall be filed.

DATED: New York, New York
November 21, 2022

Respectfully submitted,

/s/ Cara E. Greene
OUTTEN & GOLDEN LLP
Cara E. Greene
Gregory S. Chiarello
Shira Z. Gelfand
685 Third Avenue, 25th Floor
New York, New York 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060